

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2023-9-E

In the Matter of:

Dominion Energy South Carolina,
 Incorporated's 2023 Integrated
 Resource Plan (IRP)

**DOMINION ENERGY SOUTH
 CAROLINA'S FIRST AND
 CONTINUING DATA REQUESTS
 TO INTERVENOR SIERRA CLUB**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Dominion Energy South Carolina, Inc. ("Dominion" or the "Company"), by and through undersigned counsel, serves the following data requests on Intervenor Sierra Club in the above referenced docket. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

INSTRUCTIONS

1. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning that answered portion.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared using electronic workbooks, please

provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. Produced documents shall be in electronic format, and specifically, worksheets and data shall be produced in native format and machine readable by standard software.
5. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
6. If you consider any document to be privileged or protected from production, then you must: (i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Responsive documents should be provided as they become available and should not be withheld until a complete response to all requests is available. Please deliver all responses to the following interrogatories and requests for production of documents electronically to each of the following:

K. Chad Burgess
Matthew W. Gissendanner
Eric Bell
Dominion Energy South Carolina, Inc.
Mail Code C222
220 Operation Way
Columbia, SC 29033
chad.burgess@dominionenergy.com
matthew.gissendanner@dominionenergy.com
eric.bell@dominionenergy.com

Belton T. Zeigler
Womble Bond Dickinson (US) LLP
1221 Main Street, Suite 1600
Columbia, SC 29201
belton.zeigler@wbd-us.com

DEFINITIONS

1. As used in these requests, “identify” means, when asked to identify a person, to provide the full name, business title, address, and telephone number. As used in these requests, “address” means mailing address and business address. When asked to identify or provide a document, “identify” and “provide” means to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it.
2. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams,

facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications, any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist.

DATA REQUESTS

- 1-1** Upon filing any prefiled testimony in this matter, please simultaneously provide a copy of all witnesses' exhibits, schedules and workpapers used to develop the organization's positions and testimonies in this Docket. If models were used, please provide model inputs and outputs and a description of the model. Specifically, and without limiting the foregoing, please simultaneously provide:
- a. All workpapers, source data and other data or outputs used in creating any charts or graphs contained in the prefiled testimony of your witnesses in native format with all formulae intact, and
 - b. All workpapers including all input and output tables in machine readable form, with all formulae intact, for all modeling referenced in or used to develop the prefiled testimony of your witnesses.

Respectfully submitted this 11th day of April, 2023.

/s/Belton T. Zeigler

Womble Bond Dickinson (US) LLP
1221 Main Street, Suite 1600
Columbia, SC 29201
(803) 454-7720
belton.zeigler@wbd-us.com

K. Chad Burgess
Matthew W. Gissendanner
Dominion Energy South Carolina, Inc.
Mail Code C222
220 Operation Way
Columbia, SC 29033
(803) 217-8141 (KCB)
(803) 217-5359 (MWG)
chad.burgess@dominionenergy.com
matthew.gissendanner@dominionenergy.com

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2023-9-E

In the Matter of:)	
)	
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Dominion Energy South Carolina,)	
Incorporated's 2023 Integrated)	CERTIFICATE OF SERVICE
Resource Plan (IRP))	
)	
)	

This is to certify that I have caused to be served this day one copy of DESC's First Requests directed to Sierra Club to all parties of record via electronic filing.

/s/Belton T. Zeigler
Womble Bond Dickinson (US) LLP
1221 Main Street, Suite 1600
Columbia, SC 29201
(803) 454-7720
belton.zeigler@wbd-us.com